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October 27, 2016

VIA ECF

Hon. Lois Bloom
U.S. District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Ysmael Maldonado v. Corizon Health Inc., Ruel Huffstead, Dr. Frank Flores, Dr. Peter Wachtel, Dr. Raja Sabbagh, Curt Walker, Lynn Devivo, Rose Anim, Dr. Jean Richard, Ida Brown, Dr. Asha Kumar, Dr. Maung Maungoo, Daniel Ashitey, and Dr. Morsi Shaaban
Docket No.: 15 CV 6619
Our File No.: 611-3237

Dear Judge Bloom:

Our law firm has been retained as trial counsel to defendants Corizon Health, Inc., as well as individual defendants Ruel Huffstead, Curt Walker, Rosen Anim, Jean Richard, M.D., and Morsi Shaaban, M.D. Additionally, we anticipate representing defendants Raja Sabbagh, M.D., Ida Brown, Asha Kumar, M.D., Maung Maungoo, M.D., and Daniel Ashitey. We have been advised that defendant Lynn Devivo is deceased.

We write to respectfully request an extension of time to answer or otherwise respond to plaintiff's Amended Complaint on behalf of the defendants listed above, except for Corizon as an answer has already been interposed. Based on the Affidavits of Service filed with the Court, the current deadline to answer or otherwise respond to the plaintiff's Amended Complaint as to defendants Ruel Huffstead, Rose Anim, and Jean Richard, M.D. is October 27, 2016 and as to defendants Curt Walker, Ida Brown, Asha Kumar, M.D., Maung Maungoo, M.D. and Daniel Ashitey is October 31, 2016.

There have been no prior requests for an extension of time. This extension is necessary to communicate with our ten anticipated clients regarding the allegations in the Amended Complaint and properly evaluate plaintiff's claims.

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HEIDELL, PITTONI, MURPHY & BACH, LLP

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Plaintiff's counsel has consented to this request for an extension of time. We respectfully request that the defendants' deadline to respond to the Amended Complaint be extended to November 23, 2016.

Thank you for your consideration of this request.

Respectfully submitted,



Ana Maria Vizzo

AMV/ar

cc: John D. Biancamano
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